



Jeanne M. Christensen

jchristensen@wigdorlaw.com

May 29, 2024

VIA ECF

The Honorable Robyn F. Tarnofsky
U.S. District Court for the Southern District of New York
500 Pearl Street, Courtroom 9B
New York, NY 10007

Re: Anisha Mehta v. DLP Piper LLP; Case No.: 1:23-cv-04757 (AT) (RFT)

Dear Judge Tarnofsky,

We represent Plaintiff Anisha Mehta in the above-captioned matter against Defendant DLA Piper LLP (“DLA”). We write pursuant to Your Honor’s May 17, 2024 Order for the Parties to submit letters to the Court about the remaining discovery disputes in this matter. See Dkt. No. 72.

I. POTENTIAL DISCOVERY ISSUES

There are several matters that are not yet fully resolved. However, Plaintiff is unable to determine at this time whether a discovery conference on these issues may be necessary because Plaintiff has not yet received DLA’s responses for the following:

- Response to Plaintiff’s Interrogatory propounded on May 17, 2024;
- Non-privileged documents, if any, responsive to Plaintiff’s Second Supplemental Requests for Production Nos. 5-10; and
- Documents sufficient to show the results of DLA’s investigation into the two identified pregnancy discrimination complaints.

Once Plaintiff receives DLA’s responses to those items, we will be in a better position to determine whether the discovery dispute has been resolved. In addition, Plaintiff has just received DLA’s responses to Plaintiff’s First Requests for Admission this evening and has not yet had the opportunity to fully review them. Should Plaintiff have any concerns about DLA’s responses, we will first attempt to meet and confer with Defendant about those issues before raising it with the Court.



Hon. Robyn F. Tarnofsky
May 29, 2024
Page 2

II. THIRD-PARTY SUBPOENAS

Per the Court's May 17, 2024 Order, Plaintiff provided the contact information for Plaintiff's spouse and he accepted service the following day. His 30-minute deposition is noticed for June 7, 2024 at 9 a.m. PST.

Both Parties provided Plaintiff's former employers with copies of the Court's May 17, 2024 Order and the May 16, 2024 court conference transcript. UB Greensfelder LLP confirmed to both Parties that it did not intend to provide a response to the subpoena.

With respect to the Tenor Legal subpoena, as Plaintiff stated during the May 16, 2024 conference and in our prior written correspondence, we do not contest Defendant's right to documents from Tenor Legal regarding Plaintiff's mitigation efforts. This evening, Tenor Legal's counsel agreed to provide DLA with the documents listed below if DLA agrees to withdraw its subpoena to the extent it seeks any other documents or materials, and agrees not to conduct a deposition of a Tenor Legal representative:

- A copy of an offer letter from Tenor Legal to Ms. Mehta (dated October 4, 2023), explaining the terms and conditions of her employment by Tenor Legal, which Ms. Mehta accepted;
- A copy of Tenor Legal's Employee Handbook which was applicable to Ms. Mehta's employment, and which Ms. Mehta acknowledged receipt of on October 11, 2023;
- A copy of Ms. Mehta's W-4 (Employee's Withholding Certificate), dated October 6, 2023;
- A copy of Ms. Mehta's Direct Deposit Authorization form, dated October 6, 2023;
- A copy of Ms. Mehta's completed Form I-9, dated October 6, 2023 and October 11, 2023;
- A copy of Ms. Mehta's Earning Statements for the period from October 20, 2023 through December 29, 2023;
- A copy of Ms. Mehta's Form W-2 from Tenor Legal for the 2023 calendar year; and
- A copy of Ms. Mehta's Earning Statements for the period of January 12, 2024 through May 17, 2024. See Exhibit 1.

Plaintiff is amendable to Tenor Legal's proposal. As of this writing, DLA has not yet responded.

III. DEPOSITIONS

Plaintiff conducted the half-day deposition of Hilary Remijas on May 23, 2024. The Parties are currently finalizing a revised date for Carissa Bouwer's deposition. Plaintiff is waiting for Defendant to propose potential dates for Kelly Neiman, DLA's Chief Human Resources Officer. There are no other depositions to schedule.

Plaintiff does not believe that a discovery conference is necessary at this time.



Hon. Robyn F. Tarnofsky
May 29, 2024
Page 3

Should you have any questions, please do not hesitate to contact us. We thank the Court for its time and attention to this matter.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Jeanne Christensen", with a stylized, flowing script.

Jeanne M. Christensen